

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No. 4:10 CR 00595 JCH
)
KENNETH KIEL,)
)
Defendant.)

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Thomas C. Albus, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the Government states as follows:

1. There is a serious risk that the defendant will flee and is a threat to the community.
2. There is a serious risk that the defendant will obstruct or attempt to obstruct justice, or threaten, injure or intimidate, or attempt to threaten, injure or intimidate a prospective witness or juror.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial.

RICHARD G. CALLAHAN
United States Attorney

/s/ Thomas C. Albus
THOMAS C. ALBUS, #43224MO
Assistant United States Attorney